



Nebraska Central Telephone Company  
Nebraska Central Telecom, Inc.

February 23, 2009

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, D.C. 20554

RE: EB Docket No. 06-36  
Annual CPNI Certification for Year 2008

Dear Ms. Dortch:

In accordance with Public Notice DA 09-9, issued on January 7, 2009, attached is the annual CPNI certification filings for the year of 2008, pursuant to 47 C.F.R § 64.2009(e), for Nebraska Central Telecom, Inc..

Sincerely,

A handwritten signature in black ink, reading "Andrew D. Jader". The signature is fluid and cursive, with the first name "Andrew" being more prominent than the last name "Jader".

Andrew D. Jader  
Vice President – Administration

Attachment

cc: Best Copy and Printing, Inc.  
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Washington, D.C. 20554

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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for: 2008

Date filed: February 23, 2009

Name of company(s) covered by this certification: Nebraska Central Telecom, Inc.

Form 499 Filer ID: 802538

Name of signatory: Andrew D. Jader

Title of signatory: Vice President - Administration

I, Andrew D. Jader, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. If the company obtains any information with respect to the processes pretexters are using to attempt to access CPNI, it will report that information along with what steps the company is taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed



Attachment

## OPERATING PROCEDURES FOR COMPLIANCE WITH CPNI RULES

Nebraska Central Telecom, Inc. (the "Company") has implemented the following procedures to ensure that it is compliant with Part 64 of Title 47 of the Code of Federal Regulations, Subpart U – Customer Proprietary Network Information (CPNI), § 64.2001 through § 64.2011.

### Related Company Subcontractor

The Company contracts with an affiliated company, The Nebraska Central Telephone Company ("NCTC") for customer service, billing and for the maintenance of CPNI information. The Subcontractor is required to treat all Company customer information exactly as it treats its own customer information and to comply with all CPNI requirements in this operating procedure and references to personnel within this document references the individuals that NCTC uses when it conducts its efforts on behalf of the Company.

### Compliance Officer

The Company has appointed a CPNI Compliance Officer. The Compliance Officer is responsible for maintaining records and for ensuring that the Company is in compliance with all of the CPNI rules. The Compliance Officer is also the point of contact for anyone (internally or externally) with questions about CPNI.

### Personnel Training:

The Compliance Officer arranges with NCTC for the training of all personnel on an annual basis or more frequently if needed. All new personnel are trained and given a NCTC CPNI Policy Manual when hired. The training includes, but is not limited to, when personnel are and are not authorized to use CPNI, and the authentication methods the Company is using. The detail of the training can differ based on whether or not the personnel have access to CPNI.

After the training, all personnel are required to sign a certification that they have received a manual and have been trained on the CPNI rules, that they understand NCTC's procedures for protecting CPNI and they understand the NCTC's disciplinary process for improper use of CPNI. These same policies and procedures apply to the Company because of the use of NCTC personnel for the customer service functions of the Company.

Personnel are instructed that if they ever have any questions regarding the use of CPNI, or if they are aware of CPNI being used improperly by anyone, they should contact the Compliance Officer immediately.

### Disciplinary Process

The Company, through NCTC, has established a specific disciplinary process for improper use of CPNI. The disciplinary action is based on the type and severity of the violation and could include any or a combination of the following: retraining the person on CPNI rules, notation in the person's personnel file, formal written reprimand, suspension or termination.

The disciplinary process is reviewed with all personnel and is outlined in NCTC's CPNI Policy Manual (and thus is applicable to the Company) which all personnel are given.

### Customer Notification and Request for Approval to Use CPNI

The Company has provided notification to its customers of their CPNI rights and has asked for their customer's approval to use their CPNI via the opt-out method. The Company sends the opt-out notice every two years to those customers that have not previously opted out. A copy of the notification is also provided to all new customers.

The status of a customer's CPNI approval is prominently displayed as soon as the customer's account is accessed so that personnel can readily identify customers that have restricted the use of their CPNI.

For the customers that have opted-out and said the Company cannot use their CPNI, that decision will remain valid until the customer changes it.

The Company will provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

A copy of the most recent notification is kept with the files that are maintained by the Compliance Officer.

#### Marketing Campaigns

The Company maintains a record of all marketing campaigns for a period of one year. The Compliance Officer reviews the campaign and all materials to ensure that it is in compliance with the CPNI rules.

#### Authentication

The Company, through NCTC personnel, does not disclose any CPNI until the customer has been appropriately authenticated as follows:

**In-office visit** - the customer must provide a valid photo ID matching the customer's account information and the customer must be listed on the account.

**Customer-initiated call** – the customer is authenticated if they are listed as a contact on the account and able to provide the answer to the pre-established question of what the last four digits of their Social Security or Federal ID Number is. The account contact information can be located on the first screen accessed on a customer's account.

If the customer wants to discuss call detail information the following guidelines are followed:

- If the customer can provide all of the call detail information (telephone number called, when it was called, and the amount of the call) necessary to address the customer's issue, the personnel will continue with routine customer care procedures.
- If the customer cannot provide all of the call detail information to address the customer's issue, the personnel will: (1) call the customer back at the telephone number of record, (2) send the information to the address of record, or (3) ask the customer to come into the office and provide a valid photo ID.

#### Notification of Account Changes

The Company, through NCTC, sends out notifications to customers on a daily basis whenever a change is made on an account to any of the following:

- Service or billing name
- Contact name (and/or) ID #
- Address of record

NCTC's computer system that is used for accessing Company information is programmed to automatically generate a notice anytime one of the above changes has been made to an account.

The notices are put into an electronic file which are then reviewed and printed daily by the CPNI Compliance Officer. The notices are then sent to the postal address of record that same day.

#### Notification of Breaches

Personnel will immediately notify the Compliance Officer and fill out a statement of breach if there is any indication that a breach may have occurred. If it is determined that a breach has occurred, the Compliance Officer will do the following:

- Notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) as soon as practicable, but in no event later than 7 business days after determination of the breach. The notification will be via the FCC link at <http://www.fcc.gov/eb/cpni>.
- Notify customers only after 7 full business days have passed since notification to the USSS and the FBI, unless the USSS or FBI has requested an extension.
- If there is an urgent need to notify affected customers or the public sooner to avoid immediate and irreparable harm, it will be done only after consultation with the relevant investigating agency.
- Maintain a record of the breach, the notifications made to the USSS and FBI, and the notifications made to customers. The record should include dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach.
- Include a summary of the breach in the annual compliance certificate filed with the FCC.

#### Annual Certification

The Compliance Officer will file a Compliance Certification with the FCC by March 1 of each year, for data pertaining to the previous calendar year.

#### Record Retention

The Company retains all information regarding CPNI filed in the possession of the Compliance Officer. Following is the minimum retention period the Company has established for specific items:

- CPNI notification and records of approval –one year
- Marketing campaigns – one year
- Breaches – two years
- Annual certification – five years
- Employee training certification – one year beyond completion of work
- All other information – two years